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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR-13 - 402 JST
)	
Plaintiff,)	STIPULATION TO STAY FURTHER
)	BRIEFING RE: DEFENDANT'S
v.)	OMNIBUS MOTION AND PROPOSED
)	ORDER
ERIC LUNDIN,)	
)	
Defendant.)	

As promised in the motion to withdraw the defendant's omnibus motion without prejudice, the parties have met and conferred regarding a possible resolution of this case. Those discussions have been encouraging, and the parties believe a resolution of the case is possible. In order to avoid the unnecessary expenditure of resources, **the parties hereby stipulate that any further briefing relating to the defendant's omnibus motion be stayed** in order to allow the parties to attempt a final resolution of the case.

Because the Ninth Circuit has not decided the Government's appeal, no further action need be taken by the Court because the case remains as a jurisdictional matter before the Ninth Circuit, and any final resolution would necessarily await that Court's decision and remand to this Court for further proceedings. The parties ask the Court to maintain the March 25, 2016 date as a status hearing date, with the hope that it will become the date for the entry of a plea should the

1 negotiations prove successful and should the Ninth Circuit decide the Government's appeal by
2 that date. Should negotiations not prove successful, a new briefing schedule can be set at that
3 time.

4 **IT IS SO STIPULATED.**

5 Date: February 17, 2016

/s/

GEOFFREY A. HANSEN
Chief Assistant Federal Public Defender

7 Date: February 17, 2016

/s/

WILLIAM FRENTZEN
Assistant United States Attorney

10 **IT IS SO ORDERED.**

11 Date: February 18, 2016


JON S. TIGAR
UNITED STATES DISTRICT COURT JUDGE